

To: Lorang, Phil[Lorang.Phil@epa.gov]
From: Beaver, Melinda
Sent: Thur 6/8/2017 1:28:29 PM
Subject: FW: regional haze question

Think this is a fair and accurate response?

Hi Brian,

I'm not going to have time to dig into FL, DE, CT, DC, MA BART actions by Monday (out tomorrow and have many other priorities today). My sense is that for these states that were in CAIR but are not in CSAPR, no additional controls were required for BART and that existing limits satisfied BART. Florida could be the exception, but both facilities (Crystal River and Lansing Smith) where I found limits are listed as "not active" in your spreadsheet.

Melinda

From: Fisher, Brian
Sent: Wednesday, June 07, 2017 3:11 PM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Subject: RE: regional haze question

Got it, thanks

From: Beaver, Melinda
Sent: Wednesday, June 07, 2017 3:08 PM
To: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: RE: regional haze question

Hi Brian,

A bit more on Nebraska City and GGS... We only used CSAPR>BART for SO2 at GGS. We approved NE's NOx limits for GGS, and we approved both NOx and SO2 limits for Nebraska City. It's a pretty unique situation.

So, I think these rows should be:

BART Affected Plants	UniqueID	BART Status/ CAIR/ Shutdown/ Coal-to-Gas	NOx Limit	SO2 Limit	NOx Compliance Date	SO2 Compliance Date	In Draft NEEDS 6.17_Active?
Gerald Gentleman	6077_B_1	BART NOx lb/MMBtu	0.23	CSAPR	2018	2018	NE is covered by the CSAPR>BART FIP for SO2; Yesno source-specific SO2 limit on GGS
Gerald Gentleman	6077_B_2	BART NOx lb/MMBtu	0.23	CSAPR	2018	2018	NE is covered by the CSAPR>BART FIP for SO2; Yesno source-specific SO2 limit on GGS
Nebraska City	6096_B_1	BART NOx lb/MMBtu	0.23	1.2 lb/MMBtu	2018	2018	We (nor Nebraska) relied on CSAPR>BART for Nebraska City NOx or SO2

I haven't looked at the Northeast states + Florida yet.

Melinda

From: Fisher, Brian

Sent: Tuesday, June 06, 2017 1:23 PM

To: Beaver, Melinda <Beaver.Melinda@epa.gov>

Subject: RE: regional haze question

Hi Melinda,

Thanks for the response – it is very helpful.

If possible, that would be great if you could check to see if there are any BART limits in the below states we are missing. We have a couple more days (to next Monday actually), so getting the latest/greatest data reflected will be great and improve our power sector and subsequent air

modeling. It will also allow us to respond that we are fully capturing the CSAPR replacing CAIR impacts.

Thanks again for your help

From: Beaver, Melinda
Sent: Tuesday, June 06, 2017 1:18 PM
To: Fisher, Brian <Fisher.Brian@epa.gov>
Subject: RE: regional haze question

Hi Brian,

Some notes (in red) below.

From: Fisher, Brian
Sent: Monday, June 05, 2017 3:45 PM
To: Beaver, Melinda <Beaver.Melinda@epa.gov>
Subject: regional haze question

Hi Melinda,

I was wondering whether there were any cases where units (other than TX potentially) that were previously modeled as not having source specific BART because of CAIR, now would have source-specific BART because they were not covered under CSAPR?

For example

●□□□□□□ States covered by CAIR for SO₂ that are not covered by CSAPR for SO₂: DC, DE,

FL, LA, MS; also TX if/when we finalize the proposed SO₂ remand rule.

- We have a December 2017 CD deadline to take final action on BART in LA. For now, no source specific SO₂ BART limits in LA, yet. We've proposed action for a subset of the LA EGUs: <https://www.federalregister.gov/documents/2017/05/19/2017-10108/approval-and-promulgation-of-implementation-plans-louisiana-regional-haze-state-implementation-plan>. We have a June 29 deadline to propose action on the remaining EGU: Entergy's Nelson.
- MS is still working on their SO₂ BART SIP. No deadline for EPA action; therefore, no source specific SO₂ BART limits in MS, yet.
- I thought FL has a state-wide BART alternative rule, but I'm not sure, so I'll need to look.
- We haven't taken actions on DC and DE recently, so I'm not exactly sure what BART limits may be in place there. (I focused on updates that resulted from actions taken since 2015).

•□□□□□□ States covered by CAIR for either annual or OS NO_x that are not covered by either CSAPR or the CSAPR Update for either annual or OS NO_x: CT, DC, DE, FL, MA.

- I thought FL has a state-wide BART alternative rule, but I'm not sure, so I'll need to look.
- We haven't taken actions on DC, DE, CT, MA recently, so I'm not exactly sure what BART limits may be in place there. (I focused on updates that resulted from actions taken since 2015).

If you need me to double check limits for the above states, I'll need a few more days.

Are there any units in these states that find themselves with newly acquired BART requirements?

Brian Fisher

Clean Air Markets Division

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